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January 17, 2000

Mr. Michael McAteer  
U. S. EPA - Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)**  
• **January 2000 Monthly Report**

Dear Mr. McAteer,

Enclosed is the January 2000 Monthly Report for the Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

cc: (w/o enclosures)

T. Gouger - USACE  
C. Morin - IEPA  
Mayor M. King - Cahokia  
Sauget File - Solutia  
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

## **Sauget Sites Area I - Sauget, Illinois**

### **AOC - EECA / RIFS**

#### **Monthly Report**

**Date of Report:** January 17, 2000  
**Period Covered:** December 1, 1999 - December 31, 1999  
**Next Report Period:** January 1, 2000 - January 31, 2000

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#### **Work Performed during the reporting period**

1. Continued collection of downgradient alluvial aquifer samples.
2. Completed waste borings on Site N. This completes all waste borings for all Sites (N, H, I, L & N).
3. Completed grain size analysis adjacent to Site N.
4. Continued taking groundwater level readings in existing wells and newly installed piezometers.
5. Installed piezometers for slug testing.
6. Began field layout of creek sediment sampling stations in preliminary to initiation of creek sediment sampling in January.
7. 4Q99 groundwater elevation monitoring.

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#### **Data Submittal (M. McAteer only)**

The following Sediment Toxicity Testing results are submitted with this report:

- Hyallela azteca Survival and Growth Sediment Toxicity tests.
- Hyallela azteca chronic Survival, Growth and Reproduction Toxicity tests.
- Chironomus tentans Survival and Growth Sediment Toxicity Tests.
- Chironomus tentans Chronic, Growth, Emergence and Reproduction Toxicity Tests.
- Taxonomic Listing and Enumeration of Organisms.
- Listing of Praganisms Identified and Report of Total Estimated number per sample

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#### **Work scheduled for next reporting period**

1. Sample collection for treatability studies / pilot test.
  2. Identification of the western boundary of Site G
  3. Sediment sampling in Dead Creek and the Borrow Pit for industry-specific and broad-scan analyses.
  4. Boundary trenching on Site N.
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5. Fill area interior trenching (Except I - due to lack of access).
6. GPR and EM on Site I.
7. Continue alluvial aquifer sampling.

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## **Problems and Solutions**

1. Overall schedule is about one month behind original due to delays in gaining access for alluvial aquifer samples; Site I for trenching and for magnetometry survey; and Site N. Rogers Cartage gave delayed access for background soil gas samples. Solutia is working to find ways to complete the Work consistent with the original schedule.
2. Boundary Trenching and Center Trenching on Site I is delayed because Cerro Copper has not granted access for those purposes. At the request of the Agency, Solutia has agreed to conduct GPR on Site I as an interim investigative measure - to assist in the negotiations with Cerro - preliminary to completion of the SSP dictated trenching.
3. Delays were encountered in defining the western boundary of Site G due to Weise's refusal to grant timely access to his property.
4. Delays have been incurred because Rogers Cartage refused to grant access to its property for two additional tasks - not included in the original access agreement - but required by the SSP: background soil samples and background groundwater samples. Solutia and USEPA agreed to move to property owned by the Village of Sauget for collection of the soil and groundwater samples. The Village of Sauget granted Solutia access for the SSP mandated Work at its regularly scheduled Council meeting on December 14.
5. Identification of the western boundary of Site G cannot be determined per the plans and methods approved in the SSP. Solutia prepared a "deviation report" recommending alternative methodology to the Agency. USEPA and Solutia have agreed to the alternative methodology for boundary determination.

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## **Submittal Schedule Status (see attached)**

Attached schedule consistent with approved SSP.

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## **Issues under review**

**Dead Creek Flooding** - No change in this report period.

A hydraulic study of Dead Creek has been completed. Preliminary results indicate that elimination of the restricted culverts will not appreciably affect the flooding conditions. A supplemental study was completed and submitted to the Agencies on July 30 for review.

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**UAO to address flooding** - U. S. EPA UAO - Docket No. V-W-99-C-554 - dated June 21, 1999 was issued to Solutia and received June 28, 1999. The UAO requires replacement of the culverts on Dead Creek to address flooding of Dead Creek. An alternative proposal to address the cause of the flooding and the contaminated sediments directly was made to U. S. EPA by Solutia July 8 at a conference in Cahokia. This proposal was formally submitted to U. S. EPA in Solutia's July 17, 1999 Response to the UAO. As committed to in the July 8 Cahokia conference and repeated in Solutia's July 17, 1999 Response, Solutia submitted to U.S. EPA in a July 30, 1999 correspondence, commitment to implement some additional short term plans to address the flooding and the sediments under the UAO. The Agency responded to Solutia's proposals in a September 24, 1999 letter. In summary, the Agencies approved replacement of the culverts at Cargill Road and the Terminal Railway ROW; requested a work plan for the proposed installation of facilities to pump water from Sector B to the American Bottoms Treatment plant; and agreed conceptually and requested additional discussions and information on the proposal to remove contaminated sediments from Sector B and contain in an on-site double lined containment cell. On November 8, 1999, Solutia submitted an evaluation of alternatives to an on-site containment cell for dealing with the contaminated sediments from Sector B. An on-site containment is the recommended course of action to address the UAO concerns.

#### **This Report Period**

1. On December 3, Solutia submitted an on-site containment cell design for containing the Sector B contaminated sediments. A preliminary design review meeting was held with the Agencies on January 5, 2000 in Sauget.
2. A TSCA Technical Requirements Compliance Demonstration document was submitted to the Agency December 6. This document was also discussed at the January 5, 2000 preliminary design review with the Agencies.
3. Solutia continued attempts to reach agreement on an access agreement with Terminal RR for purposes of performing the UAO required Work at Cargill Road and the Terminal RR crossing. Solutia has requested assistance from USEPA in gaining access from Terminal. USEPA has agreed to issue an order to Terminal.

#### **Plans for Next Report Period**

1. Complete all necessary access procurements for culvert replacement.
  2. Begin geotechnical investigatory work for culvert replacement.
  3. Begin procurement of materials for culvert replacement.
  4. Review the Sector B sediments Containment Cell design with the public at the January 25, 2000 Cahokia Town Hall meeting.
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**Comments:**

O'Brien & Gere has been selected to perform the Data Validation and Management requirements of the SSP.

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**January 21, 1999 Sauget Area I AOC**  
**SCHEDULE**

**(11/99 Revision)**

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|--|---|
| 1. Designation of Contractor                         | Completed 3/10/99 <sup>1</sup>  |
| 2. Designation of Other Contractors                  | 5 Business Days Before Start of Work  |
| 3. Designation of Project Coordinator                | Completed   |
| 4. Submit Support Sampling Plan (SSP)                | Submitted February 22, 1999   |
| 5. Submit Revised SSP                                | April 8, 1999 <sup>2</sup><br>June 25, 1999 <sup>3</sup><br>August 13, 1999 <sup>4</sup><br><b>September 9, 1999<sup>5</sup> Approval</b> |
| 6. Obtain Access Agreements                          | July 1, 1999 <sup>6</sup><br>September 17, 1999 <sup>7</sup><br>October 1, 1999 <sup>8</sup>  |
| 7. Submit Health and Safety Plan (HASP)              | Approved September 9, 1999  |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved September 9, 1999  |

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<sup>1</sup> Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

<sup>2</sup> Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

<sup>3</sup> April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25<sup>th</sup> as required.

<sup>4</sup> June 25<sup>th</sup> SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

<sup>5</sup> August 13, 1999 SSP submittal as revised August 30, 1999 and September 7, 1999 received final Agency approval on September 9, 1999.

<sup>6</sup> Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

<sup>7</sup> Access agreements update issued August 15, 1999 with request to extend deadline to September 17, 1999. Extensions to September 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

<sup>8</sup> Access agreements update issued September 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a September 21, 1999 e-mail to Mike Light

**January 21, 1999 Sauget Area LAOC**

**SCHEDULE (Cont.)**  
**(11/99)**

9. Sampling Notification	10 Business Days Prior to Start of Work <sup>9</sup>
10. Submit Data Report	01/09/01 <sup>10</sup>
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal - 03/09/01
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal - 04/09/01
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999 <sup>11</sup>

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<sup>9</sup> Notification given on August 19, 1999 that Air Sampling will begin on September 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

<sup>10</sup> Per SSP - 16 mo. from SSP approval date of 9/9/99.

<sup>11</sup> Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10<sup>th</sup> of the month.